## Environmental Management Review Western Area Power Administration

## **Executive Summary**

U.S. EPA Region 8 Denver, Colorado November, 1998

## WESTERN AREA POWER ADMINISTRATION ENVIRONMENTAL MANAGEMENT REVIEW FINAL REPORT EXECUTIVE SUMMARY

The Environmental Protection Agency Region 8 Federal Facilities Program conducted an Environmental Management Review (EMR) at Western Area Power Administration (Western) from July to October, 1998. Two facilities were reviewed - the Headquarters Corporate Services Office (CSO) in Golden, Colorado, and the Rocky Mountain Regional Office (RMR) in Loveland, Colorado. The EMR Team spent August 24, 1998, at CSO and August 25-26, 1998, at RMR. An out briefing was presented at both CSO and RMR on September 1, 1998.

Western selected two topics for the focus of the EMR: "Environmental Commitment" and "Formality of Environmental Programs." The EMR Team used Phase 3 of the interagency Generic Protocol for Conducting Environmental Audits of Federal Facilities. Phase 3 covers facility-wide environmental management system assessments. EMR included a review of documentation validated by a facility tour at RMR and 39 interviews across a variety of levels and functions at both locations.

This report provides (1) background on Western's business conditions and operations, (2) successful practices on which Western can build, (3) tables of EMR conclusions which also identify missing elements and incomplete implementation in Western's current systems, and (4) suggestions for developing a strategic plan for improving Western's systems. Because each of Western's Regions is autonomous, the EMR Team caveats this report with the observation that RMR may not be representative of the other Regions.

Generally, Western has a strong foundation for their environmental management systems. This foundation includes a clearly and broadly communicated commitment to environmental compliance, a dedicated, knowledgeable and well-regarded environmental staff, and specific environmental projects that are well defined and well executed.

The EMR Team did see areas where improvements could be made. Western's management could do more to demonstrate their commitment to environmental protection on an ongoing basis. The Agency could also improve the understanding of and attitude of personal responsibility for environmental protection by managers and staff.

The EMR Team saw a lack of formality in some areas. Western top management's lack of emphasis on goals and action plans leads to a day-to-day compliance approach implemented by each Region without review. A day-to-day focus is likely to mean delays in completion of long term projects, and variable participation by and support across the organization. This could have business consequences such as extra cost from redundant activities, risk exposure due to things falling through the cracks, or customer impacts when inconsistent approaches across Regions lead to confusion or shopping among Regions for the "preferred" answer.

Western's Environmental Managers' Team is beginning to look at these issues. More rigor in their process and full participation by the Regions should be encouraged. As best management practices are identified, they should be implemented expeditiously across the Regions. As deficiencies are identified, they should be corrected promptly.

Environmental performance is dependent more on the high caliber and experience of Environmental Office personnel than on formal management systems. With staffing cuts or vacancies, Western could lose continuity of expertise, capability and understanding. This could also affect communication and collaboration within the Region or across the Agency, impact Western's compliance program, and reduce the environmental program's ability to support Western's needs in the rapidly changing, highly competitive utility industry.

This report identifies specific missing elements in Western's present environmental management systems as well as areas where implementation of the current systems is incomplete. The report also includes an outline of suggested strategic actions which the Agency could take to improve its systems. The outline includes six elements:

- 1) Identify and prioritize key strategic opportunities through:
  - a. fast tracking the self-assessments of individual environmental programs, such as hazardous waste, stormwater, etc., and
  - b. looking at all business processes to identify those with potential environmental impacts.
- 2) Expand environmental knowledge and ownership.
- 3) Develop goals to lead the RMR (or Western wide) environmental program.
- 4) Evaluate the compliance assurance program across Western.
- 5) Improve environmental document management within RMR and possibly at other Regions.
- 6) Implement periodic review of environmental management systems

Within six months of receipt of the final EMR report, Western has agreed to provide written feedback to EPA about the usefulness of the report and any follow-up which Western has undertaken or plans to undertake to improve their environmental management systems. The EMR Team Leader will talk informally with the designated Western EMR contacts over the following year to follow the changes.